

FILED
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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
(EASTERN DIVISION) APR 11 2005 12:28

M² CONSULTING, INC.,

Plaintiff,

v.

MRO SOFTWARE, INC.,

Defendant.

U.S. DISTRICT COURT
DISTRICT OF MASS.

Case No. 03-12589-GAO

**M2 CONSULTING, INC.'S
MOTION TO SEAL PLAINTIFF'S EMERGENCY MOTION TO ENJOIN MRO'S
MISUSE OF INFORMATION PRODUCED IN DISCOVERY, FOR DEFAULT
JUDGEMENT, COSTS AND SANCTIONS**

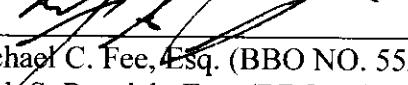
Pursuant to Local Rules 7.1 and 7.2, and Fed. R. Civ. P. 26(c), Plaintiff, M2 Consulting, Inc. ("M2") hereby requests that its: (1) Emergency Motion To Enjoin MRO's Misuse Of Information Produced In Discovery, For Default Judgment, Costs And Sanctions ("M2's Emergency Motion"), (2) The Affidavits of James A. Foley and Rick Bevington, and the affidavits of Mark S. Resnick and Rick Bevington in Support of Requests for Costs, (3) any responsive pleadings filed by the Defendant, MRO Software, Inc. ("MRO"), and (4) these motion papers (collectively the "Subject Pleadings"), be sealed until further order of the Court.

As grounds for this request, M2 states it is a private technology company with a variety of military and government customers. The Subject Pleadings involve an unauthorized breach of M2's security by MRO. They contain trade secrets and/or proprietary business information of M2, which, if publicly disclosed would cause M2 irreparable harm.

In further support of this Motion, M2 submits herewith its Memorandum in Support of M2 Consulting, Inc.'s Motion To Seal Plaintiff's Emergency Motion To Enjoin MRO's Misuse Of Information Produced In Discovery, For Default Judgment, Costs And Sanctions

WHEREFORE, M2 respectfully requests that this Motion be allowed and that the above referenced pleadings be sealed . Further, this Court should order MRO and its counsel to refrain from any other public disclosure of these matters pending resolution of M2's Emergency Motion.

M2 Consulting, Inc.
By its Attorneys
Fee, Rosse & Lanz, P.C.

By: 
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April 11, 2005

CERTIFICATE OF SERVICE

I, Mark S. Resnick, hereby certify that on April 11, 2005, a copy of this pleading was served upon the Defendant, by telecopier and by first class mail, postage pre-paid, to Lee Gesmer, Esq., Gesmer Updegrove LLC, 40 Broad Street, Boston, MA 02109.

